Honeywell's Docket No. 30-4790 (4780) Practitioner's Docket No. 595.48-US3

In other words, claim 1 recites that the contemplated slurry solution to be used in a CMP process, whereby there is a Cu/Ta/TaN surface, is to be a single-step slurry, as opposed to a slurry that requires more than one step. Claim 19 echoes the single-step slurry requirement of claim 1.

Kaufmann clearly and explicitly teaches against a single-step slurry solution when he states in Column 3, lines 3-11:

"Current copper containing substrates that are polished using chemical mechanical polishing also use Ta and TaN adhesion layers. Ta and TaN are chemically very passive and mechanically very hard, and thus difficult to remove by polishing. The use of a single slurry, which performs with a high Cu:Ta selectivity demand prolonged polishing times for Ta, i.e. a significant overpolishing times (sic) for copper, during which there is a significant degradation of dishing and erosion performance." (emphasis added).

Therefore, based on the teachings of Kaufmann, one of ordinary skill in the art of CMP would not find any teaching, suggestion or motivation in Kaufmann to prepare a single-step slurry solution for planarizing a surface that comprises Cu and at least one of Ta or TaN. As a matter of fact, one ordinarily skilled in the art of CMP would actually be discouraged from attempting to prepare a single-step slurry after a fair reading of Kaufmann. Further, based on this argument, among others, Kaufmann should be removed as a possible cited reference against the present application and current claims set.

Honeywell's Docket No. 30-4790 (4780) Practitioner's Docket No. 595.48-US3

Request For Allowance

Claims 1 and 12-33 are pending in this application. The applicant requests allowance of all pending claims.

Respectfully submitted,

Fish & Associates, LLP

Dated: November 7, 2001

Sandra P. Thompson, PhD, Esq.

/ Reg. No. 46,264

Attorneys for Applicant(s) 1440 N. Harbor Blvd., Suite 706 Fullerton, CA 92835

Tel.: (714) 449-2337

Fax: (714) 449-2339